

1 Charles L. Thompson, IV, State Bar No. 139927
2 charles.thompson@ogletreedeakins.com
3 Kevin D. Reese, State Bar #172992
4 kevin.reese@ogletreedeakins.com,
5 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
6 Steuart Tower, Suite 1300
7 One Market Plaza
8 San Francisco, CA 94105
9 Telephone: 415.442.4810
10 Facsimile: 415.442.4870
11 Attorneys for Defendant
12 CROWN BUILDING MAINTENANCE CO.
13

14 Phillip M. Miller, State Bar No. 87877
15 pmiller@sjlawcorp.com
16 Kimberly A. Hancock, State Bar No. 205567
17 khancock@sjlawcorp.com
18 SALTZMAN & JOHNSON LAW CORPORATION
19 44 Montgomery Street, Suite 2110
20 San Francisco, CA 94104
21 Telephone: 415.882.7900
22 Facsimile: 415.882.9287
23 Attorneys for Plaintiffs
24 SERVICE EMPLOYEES INTERNATIONAL
25 UNION NATIONAL INDUSTRY PENSION
26 FUND, et al.
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SERVICE EMPLOYEES INTERNATIONAL
UNION NATIONAL INDUSTRY PENSION
FUND; STEPHEN ABRECHT, Trustee;
RODERICK S. BASHIR, Trustee; KEVIN J.,
DOYLE, Trustee; DAVID A. STILWELL
Trustee; STEVEN W. FORD, Trustee;
LARRY T. SMITH, Trustee; FRANK A.
MAXSON, Trustee; EDWARD MANKO,
Trustee; JOHN J. SHERIDAN, Trustee; and
MYRIAM ESCAMILLA, Trustee,

Case No. CV 12 5328 JSC

**STIPULATION AND [PROPOSED] ORDER
EXTENDING DEFENDANT'S TIME TO
RESPOND TO PLAINTIFFS' FIRST
AMENDED COMPLAINT**

Complaint Filed: October 16, 2012

Plaintiffs,

v.

CROWN BUILDING MAINTENANCE CO.,
a California corporation, doing business as
ABLE BUILDING MAINTENANCE CO.,

Defendant.

1 Pursuant to Local Rule 6.1(a), the parties hereby stipulate to an extension of time for
2 Defendant Crown Building Maintenance Co., doing business as Able Building Maintenance Co.
3 (“ABLE”), to respond to Plaintiffs’ First Amended Complaint.

4 **RECITALS**

5 1. On October 16, 2012, Plaintiffs filed a Complaint pursuant to Sections 502
6 and 515 of the Employee Retirement Income Security Act of 1974, as
7 amended (“ERISA”), alleging Defendant ABLE has failed to pay in full
8 certain contributions due and owing to the SEIU Pension Fund.

9 2. On November 16, 2012, Plaintiffs filed a First Amended Complaint
10 generally alleging Defendant ABLE failed to make additional contributions
11 that it was required to make.

12 3. A response to the First Amended Complaint is currently due on December 3,
13 2012.

14 4. For good cause, the parties hereby stipulate and agree that a response to the
15 First Amended Complaint in this action shall be due no later than December
16 17, 2012. The parties hereby aver that the date will not alter the date of any
17 event or delay any deadline already set by the Court.

18 **STIPULATION**

19 Pursuant to Local Rule 6.1(a), the parties hereby stipulate to extend the deadline for
20 Defendant ABLE to respond to Plaintiffs’ First Amended Complaint to no later than December 17,
21 2012.

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1 DATED: December 3, 2012

2 OGLETREE, DEAKINS, NASH, SMOAK &
3 STEWART, P.C.

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5 By: _____
6 Charles L. Thompson, IV
7 Kevin D. Reese

8

9 Attorneys for Defendant
10 CROWN BUILDING MAINTENANCE CO.

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12 DATED: December 3, 2012

13 SALTZMAN & JOHNSON LAW
14 CORPORATION

15

16 By: _____
17 Phillip M. Miller
18 Kimberly A. Hancock

19

20 Attorneys for Plaintiffs
21 SERVICE EMPLOYEES INTERNATIONAL
22 UNION NATIONAL INDUSTRY PENSION
23 FUND, et al.

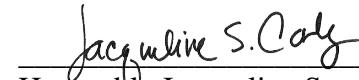
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25 IT IS SO ORDERED:

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27 DATED: December 4, 2012

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Honorable Jacqueline Scott Corley
Magistrate Judge